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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BERNARD YOUNG,  
  
Petitioner,  
  
vs.  
  
RENEE BAKER, *et al.*,  
  
Respondents

Case No. 2:18-cv-00110-RFB-VCF

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME  
(SECOND REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an order granting a thirty (30) day enlargement of time, to and including May 27, 2020, in which to file and serve a reply to Bernard Young's opposition to Respondents' motion to dismiss Young's habeas corpus petition.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

Respondents have requested one prior enlargement of time to respond. This motion is made in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 10th day of March, 2020.

AARON D. FORD  
Attorney General

By: /s/ Geordan Goebel  
GEORDAN GOEBEL (Bar. No. 13132)  
Deputy Attorney General

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**DECLARATION OF COUNSEL**

I, Geordan Goebel, hereby states, based on personal knowledge, that the assertions of this declaration are true:

1. I am a Deputy Attorney General employed by the Attorney General's Office of the State of Nevada in the Post-Conviction Division (PCD), and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. By this motion, I am requesting a thirty (30) day enlargement of time, to and including May 27, 2020, in which to file and serve a reply to petitioner's opposition to Respondents' motion to dismiss Bernard Young's petition. This is my second request for enlargement.

3. Respondents' reply to Young's opposition to Respondent's motion to dismiss Bernard Young's petition is currently due April 27, 2020.

4. The PCD is responding to this petition. Earlier this week in a different case, I received an Emergency Motion for Release Pending Decision Due to Risks of Infection by COVID-19. My opposition to this Emergency Motion is also due on April 27, 2020.

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1           5.       I currently have 23 Federal Habeas matters assigned to me, and I need the additional  
2 time to handle an increased case load with other case deadlines in addition to this case, to complete my  
3 review of the voluminous record in this case, and to prepare an appropriate reply to the opposition to  
4 the petition.

5           6.       This motion for enlargement of time is made in good faith and not for the purpose of  
6 unduly delaying the ultimate disposition of this case.

7           7.       On April 23, 2020, I emailed opposing counsel Emma Smith to determine if she had any  
8 opposition to my extension of time request. Ms. Smith graciously agreed to my request for additional  
9 time.

10          8.       Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the  
11 foregoing is true and correct.

12               Executed on this 23rd day of April, 2020.

13                               /s/ Geordan Goebel  
14                               GEORDAN GOEBEL  
15                               Deputy Attorney General

16  
17                               **ORDER**

18  
19 IT IS SO ORDERED.

20  
21                                 
22                               \_\_\_\_\_  
23                               RICHARD F. BOULWARE, II  
24                               UNITED STATES DISTRICT JUDGE

25  
26  
27               DATED this 23rd day of April, 2020.  
28

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General and that on this 23rd day of April, 2020, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (SECOND REQUEST)**, by U.S. District Court CM/ECF electronic filing to:

Emma L. Smith  
Assistant Federal Public Defender  
411 E. Bonneville Ave., Ste. 250  
Las Vegas, Nevada 89101

/s/ Amanda White